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10 ATTORNEYS FOR PLAINTIFFS

11 **UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

12 CHINA CENTRAL TELEVISION, a China  
company; CHINA INTERNATIONAL  
13 COMMUNICATIONS CO., LTD., a China  
company; TVB HOLDINGS (USA), INC., a  
14 California corporation; and DISH  
15 NETWORK L.L.C., a Colorado corporation,  
16 Plaintiffs,

vs.  
17 CREATE NEW TECHNOLOGY (HK)  
LIMITED, a Hong Kong company; HUA  
18 YANG INTERNATIONAL TECHNOLOGY  
LIMITED, a Hong Kong company;  
19 SHENZHEN GREATVISION NETWORK  
TECHNOLOGY CO. LTD., a China  
20 company; CLUB TVPAD, INC., a California  
corporation; BENNETT WONG, an  
individual, ASHA MEDIA GROUP INC.  
d/b/a TVPAD.COM, a Florida corporation;  
22 AMIT BHALLA, an individual;  
NEWTPAD LTD. COMPANY d/b/a  
23 NEWTPAD.COM a/k/a TVPAD USA, a  
Texas corporation; LIANGZHONG ZHOU,  
24 an individual; HONGHUI CHEN d/b/a E-  
DIGITAL, an individual; JOHN DOE 1 d/b/a  
25 BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN  
DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;  
26 JOHN DOE 5 d/b/a GANG YUE; JOHN  
DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7  
27 d/b/a GANG TAI WU XIA; and JOHN DOES  
8-10,  
28 Defendants.

) Case No.  
**CV 15-1869 SVW (AJWx)**

**DECLARATION OF  
SEAN M. SULLIVAN IN  
SUPPORT OF  
PLAINTIFFS' NOTICE  
OF NON-OPPOSITION  
TO HOLD THIRD  
PARTIES AZURE  
TECHNOLOGY CO.,  
LTD.; ZERO DDOS LLC;  
AND CLEARDDOS  
TECHNOLOGIES IN  
CONTEMPT**

Courtroom: 10A  
Judge: Hon. Steven V.  
Wilson

1                    **DECLARATION OF SEAN M. SULLIVAN**

2                    I, Sean M. Sullivan, declare as follows:

3                    1. I am an attorney with Davis Wright Tremaine LLP and am one of the  
4 attorneys of record for Plaintiffs. I have personal knowledge of the matters herein.

5                    2. On October 17, 2017, copies of the Notice of Motion and Motion to  
6 Hold Third Parties Azure Technology Co., LTD, Zero DDOS LLC, and ClearDDOS  
7 Technologies In Contempt; Declaration of George Wukoson In Support of Plaintiffs'  
8 Motion for Contempt; Declaration of Nicholas Braak In Support of Plaintiffs' Motion  
9 for Contempt; and [Proposed] Order Granting Plaintiffs' Motion to Hold Third  
10 Parties Azure Technology Co., LTD, Zero DDOS LLC, and ClearDDOS  
11 Technologies in Contempt (the "Service Documents") were sent via certified mail to  
12 Azure Technology Co., LTD ("Azure Tech") at the following physical address  
13 associated with Azure Tech in public records: 1644 Sherman Street, Denver,  
14 Colorado, 80203. *See* ECF Dkt. 218-28; *see also* Certified Mail Receipt attached  
15 hereto as Exhibit 1. The Service Documents were returned to Davis Wright  
16 Tremaine LLP, with a notation that they were "returned to sender." *See* Exhibit 2.

17                    3. On October 19, 2017, copies of the Service Documents were also sent to  
18 Azure Tech via email at the following email addresses associated with Azure Tech in  
19 public records or obtained through counsel's prior communications with Azure Tech:  
20 [terry@azure-tech.com](mailto:terry@azure-tech.com), [abuse@azure-tech.com](mailto:abuse@azure-tech.com), and [ts@azure-tech.com](mailto:ts@azure-tech.com). Exhibit 3;  
21 ECF Dkt. 219. On the same day, a person signing as "Simon" and using the email  
22 address [ts@azure-tech.com](mailto:ts@azure-tech.com) responded by email stating "We have been informed [sic]  
23 our Customer and dealing with it. Thanks for contacting us." Exhibit 4.

24                    4. On October 17, 2017, copies of the Service Documents were sent via  
25 certified mail to ZERO DDOS LLC ("Zero DDOS") at the following physical  
26 addresses associated with Zero DDOS in public records: 530 W. 6<sup>th</sup> Street, Los  
27 Angeles, California; 5711 W. Kentucky Avenue, Lakewood, Colorado, 80202; and  
28 115 S. Pikes Peak, Florence, Colorado, 81226. *See* ECF Dkt. 218-28; *see also*

1 Exhibit 1. The current resident of 5711 W. Kentucky Avenue, Lakewood, Colorado,  
2 80202 informed Davis Wright Tremaine LLP that Zero DDOS was not located at that  
3 address. No response has been received regarding the Service Documents sent to the  
4 two other addresses.

5 5. On October 19, 2017, copies of the Service Documents were also sent to  
6 Zero DDOS via email at the following email address associated with Zero DDOS in  
7 public records or obtained through counsel's prior communications with Zero  
8 DDOS: [colin@zeroddos.com](mailto:colin@zeroddos.com). Exhibit 5; ECF Dkt. 219. On the same day, a person  
9 using the email address [support@esited.com](mailto:support@esited.com) responded by email stating "We have  
10 received your support request and will respond to it within 24 hours. However we  
11 normally respond to most requests within a few hours." Exhibit 6.

12 6. On October 17, 2017, copies of the Service Documents were sent via  
13 federal express to ClearDDOS Technologies ("Clear DDOS") at the following  
14 physical addresses associated with Clear DDOS in public records: 215-5625 Senlac  
15 Street, Vancouver, BC, V5R 6G8, Canada; and 14/F, Kowloon Building, 555 Nathan  
16 Road, Mongkok, Kowloon, Hong Kong. *See* ECF Dkt. 218-28; *see also* Federal  
17 Express Tracking Receipt attached hereto as Exhibit 7.

18 7. On October 19, 2017, copies of the Service Documents were also sent to  
19 Clear DDOS via email at the following email addresses associated with Clear DDOS  
20 in public records or obtained through counsel's prior communications with Clear  
21 DDOS: [cs@clear-ddos.com](mailto:cs@clear-ddos.com), [support@clear-ddos.com](mailto:support@clear-ddos.com), and [herotm@gmail.com](mailto:herotm@gmail.com).  
22 Exhibit 8; ECF Dkt. 219. On the same day, a person signing as "Simon" and using  
23 the email address [simon.gao@data99.com](mailto:simon.gao@data99.com) responded by email stating "We have been  
24 informed [sic] our Customer and dealing with it. Thanks for contacting us." Exhibit  
25 9.

26 I declare under penalty of perjury under the laws of the United States of  
27 America that the foregoing is true and correct.

28 Executed this 13th day of November, 2017 in Los Angeles, California.

/s/ Sean M. Sullivan

Sean M. Sullivan